

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION**

**SECURITIES AND EXCHANGE
COMMISSION,**

Plaintiff,

v.

**TANNER S. ADAM, JONATHAN L.
ADAM, TRITEN FINANCIAL GROUP,
LLC, and GCZ GLOBAL LLC,**

Defendants, and

**AVA A. ADAM, GARRETT L.W. ADAM,
ROBERT S. ADAM, CARRIE L. ADAM,
EMILIO F. HINOJOSA, AND VIRGINIA
I. HINOJOSA,**

Relief Defendants.

**Civil Action File No.
1:24-cv-03774-MHC**

JURY DEMAND

DECLARATION OF KRYSTA M. CANNON

Pursuant to 28 U.S.C. § 1746, the undersigned states as follows:

1. I am a Senior Accountant in the Enforcement Division of the United States Securities and Exchange Commission (the “Commission”). I have been licensed by the State of Georgia as a CPA since November 2000. I am over eighteen years of age and am competent to make this declaration.

2. I am the staff accountant who was part of the team assigned to the investigation of possible violations of the securities laws by the Defendants in the above-entitled cause of action, and I submit this declaration in support of the Commission's Motion for Remedies.

3. This Declaration is based upon my personal review of the following financial records, including monthly account statements, cancelled checks, deposit records, and wire details for the accounts listed below:

Account Name	Financial Institution	Account Number	Start Date	End Date
GCZ Global, LLC	Wells Fargo	1975215573	June 6, 2023	June 30, 2024
GCZ Global, LLC	Wells Fargo	8892573372	February 12, 2024	June 30, 2024
Jonathan Adam Ava Adam	Wells Fargo	3865624153	January 31, 2022	May 31, 2024
Jonathan Adam Ava Adam	Wells Fargo	7450691972	January 3, 2022	June 12, 2024
Shorestream Limited	Wells Fargo	7250931925	April 1, 2024	June 30, 2024
Tanner Adam	First Carolina	4004002767	May 10, 2023	March 8, 2024
Tanner Adam	JPMC	219593016	December 23, 2021	June 25, 2024
Tanner Adam	JPMC	514347478	March 18, 2024	June 28, 2024
Tanner Adam	JPMC	514347486	March 18, 2024	June 28, 2024
Tetragon FLP, LLC	JPMC	929116082	February 23, 2023	June 28, 2024
Triten Financial Group LLC	Comerica Bank	1883178368	January 20, 2023	March 31, 2023
Triten Financial Group LLC	Comerica Bank	1883189126	January 1, 2023	March 31, 2023
Triten Financial Group, LLC	First Carolina Bank	1004002773	May 1, 2023	February 29, 2024
Triten Financial Group, LLC	First Carolina Bank	1004002906	March 20, 2023	February 29, 2024
Triten Financial Group, LLC	First Carolina Bank	1004002964	July 3, 2023	February 29, 2024
Triten Financial Group, LLC	JPMC	514347767	March 4, 2024	June 28, 2024
Triten Financial Group, LLC	JPMC	3376207451	March 4, 2024	June 28, 2024
Triten Financial Group, LLC	JPMC	586638689	February 26, 2024	June 28, 2024
Triten Financial Group, LLC	JPMC	586700919	February 26, 2024	June 28, 2024
Triten Financial Group, LLC	JPMC	936898912	March 23, 2023	June 28, 2024
Triten Financial Group, LLC	JPMC	C58437002	June 1, 2024	June 28, 2024

4. The Commission obtained the financial account information detailed in paragraph 3 above from the listed financial institutions.

5. Based on my review of the accounts identified in paragraph 3, I have concluded that Defendants used funds they received from investors to pay interest

and principal to other investors, to pay finders' fees and to pay personal expenses of Jonathan Adam and Tanner Adam, (collectively, the "Adam Brothers") and their family.

6. In addition to my review of the accounts identified in paragraph 3, I have also reviewed accountings provided by the Adam Brothers through their counsel whereby they have provided electronic downloads of selected accounts along with explanations for sources and uses of funds.

7. Bank records from February 1, 2023, through June 30, 2024, show that the Adam Brothers misappropriated more than \$19 million of the investor funds that they raised. Because the Adam Brothers commingled investor funds, I was not able to determine the specific amount of ill-gotten gains that Jonathan Adam or Tanner Adam received. The following table reflects the incoming investor funds less payments back to investors, finders' fees, and net funds sent to the crypto markets.

	Triten	GCZ	Total
Investor funds raised in business and personal accounts	\$ 40,707,612	\$ 20,852,322	\$ 61,559,934
Investor Payments	(24,480,078)	(6,567,081)	(31,047,159)
Net Disgorgement	16,227,534	14,285,241	30,512,775

8. Tanner Adam directed investor funds in the amount of \$3.725 million towards the down payment and progress payments for an 11,861 square foot, five-

bedroom, nine-and-a-half-bathroom penthouse condominium he is building in Miami, with a total purchase price of nearly \$30 million.

9. The Adam Brothers directed a total of \$1,599,300 to a Texas home builder who built custom homes for their brother, their parents, Jonathan, and Jonathan's in-laws.

10. In addition to the construction cost of the four new homes in Texas, Jonathan, both individually and through GCZ, paid \$237,355 to purchase five acres of land which was divided and used for three of the four Texas homes.

11. Jonathan paid at least \$480,000 to the builder for construction of a new home for himself and his partner, Ava Adam.

12. Ava Adam, benefitted from the use of investor funds for virtually all living expenses for the period from March 1, 2023 through July 31, 2024. From the accounting provided directly by Jonathan Adam for his and Ava's joint personal account, at least \$258,000 of investor funds were used to pay numerous expenses incurred by or benefitting Ava, including health insurance mortgage payments, car payments, car insurance, household expenses, and credit card bills.

13. Ava Adams also received direct transfers of \$62,000 to her personal checking account.

14. Additionally, Jonathan paid over \$131,000 on home and construction related expenses for his new home, including over \$75,000 for the construction of a pool, and \$44,000 to a construction company owned by his in-laws.

15. Jonathan Adam paid \$56,900 in annual rent for a home for himself and Ava as well as a second home for his parents to live in during the construction period on the new homes.

16. Jonathan directed a total of over \$490,000 for the purchase of cars, trucks, and recreational vehicles.

17. The Adam Brothers used investor funds to pay living expenses for themselves and for their parents, Robert and Carrie Adam, including designer purchases at Louis Vuitton, Carolina Herrera, and Jimmy Choo, and credit card payments of over \$290,000. Jonathan made cash withdrawals in excess of \$350,000.

18. Tanner designated a Triten bank account for his parents from which his parents made credit card payments, tax payments, and payments for other living expenses exceeding \$65,000 in a four-month period ending in June 2024. In total, the Adam Brothers designated over \$190,000 to the benefit of their parents' account and payments on their behalf.

19. The Adam Brothers directed \$325,782 in investor funds to build a home for their parents.

20. In addition to \$412,000 paid towards the construction of a home for their brother, Garrett Adam, the Adam Brothers purchased him a vehicle for \$85,254 and made payments to him in excess of \$160,000 during the Relevant Period.

21. Jonathan's brother-in-law, Emilio Hinojosa, invested \$30,000 into GCZ and in return received \$24,664 in cash. In addition to purchasing the land the home was built upon, Jonathan paid \$379,695 for construction of a new home for his in-laws, Emilio and Virginia Hinojosa.

I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge and belief.

Dated: September 30, 2025

Krysta M. Cannon

Krysta M. Cannon